



*A Complex Litigation & Trial Practice*

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November 30, 2018

**VIA CM/ECF**

Honorable Judith C. McCarthy, U.S.M.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street, Courtroom 621  
White Plains, NY 10601-4150

**Re: Russell Hughes v. Weleda, Inc.,**  
**Case No: 7:17-cv-02494-CS**

Dear Judge McCarthy:

We represent plaintiff Russell Hughes in the above-captioned matter. We write to inform Your Honor that the Parties engaged in an all-day mediation with the Honorable Garrett E. Brown, Jr. (Ret.) on November 28, 2018. With the assistance of Judge Brown, the Parties made substantial progress towards a potential resolution of the litigation. The Parties have scheduled a follow-up conference call with Judge Brown on December 5<sup>th</sup> to continue discussing the potential for a resolution. As the Parties continue to focus their efforts with Judge Brown, the Parties jointly and respectfully request that the December 6, 2018<sup>th</sup> telephonic conference before Your Honor be adjourned approximately two weeks as the parties continue to work with Judge Brown. Should Your Honor grant this request, the Parties suggest the following dates and times for the conference if they are convenient for the Court:

- Monday, December 17, 2018 between 11 AM – 4 P.M.;
- Tuesday, December 18, 2018 between 12 noon – 4 P.M.;
- Wednesday December 19, 2018 between 10:30 AM – 4 P.M.;
- Thursday, December 20, 2018 between 10:30 AM – 4 P.M.;
- Friday, December 21, 2018 between 11 AM – 3 P.M.;

Additionally, the Parties have continued to produce discovery pursuant to the most recent discovery schedule (Dkt. 42) set by Your Honor. To date, Defendants have produced more than 120,000 documents, including ESI, which Plaintiff is currently in the process of reviewing.

Thank you for your consideration in this matter.

Very truly yours;

**THE SULTZER LAW GROUP P.C.**

A handwritten signature in black ink, appearing to read "Adam Gonnelli". The signature is fluid and cursive, with the first name "Adam" written in a larger, more prominent script than the last name "Gonnelli".

Adam Gonnelli

cc: Counsel of Record via ECF